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5 *Attorney for Defendant*
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7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9 UNITED STATES OF AMERICA,)
10) 2:23-MJ-389-EJY
11 Plaintiff,)
12 vs.) **STIPULATION & ORDER**
13 DENNIS DILLON,)
14 Defendant.)
15 _____)

16 Defendant DENNIS DILLON, by and through his counsel Benjamin Durham,
17 and the United States, by and through RANDOLPH ST CLAIR, Assistant United
18 States Attorney, counsel for Plaintiff, submit this stipulation as required by the Court.

20 The parties stipulate as follows:

21 1. Mr. Dillon has completed all requirements as set forth in the Plea Agreement filed
22 on November 29, 2023. (ECF 9).

24 2. Accordingly, the parties jointly move to allow Mr. Dillon to withdraw his guilty
25 plea to Count One of the Criminal Complaint, and the government moves to amend Count
26 One to a charge of Reckless Driving, a violation of 36 CFR 4.2 and NRS 484B.653.
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1 3. The parties stipulate to allow Mr. Dillon to plead guilty to the amended Count
2 One, and the parties jointly recommend that the original sentence be applied to the
3 Reckless Driving count as amended and that this matter be closed.
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5 DATED this 30th day of May, 2024
6

7 BENJAMIN DURHAM LAW FIRM
8

JASON M. FRIERSON
United States Attorney

9 */s/ Benjamin Durham*

10 */s/ Randolph J. St. Clair*
11

12 BENJAMIN DURHAM
13 Nevada Bar No. 7684
14 *Attorney for Defendant*

RANDOLPH J. ST. CLAIR
Assistant United States Attorney

15 **ORDER**
16

17 IT IS SO ORDERED.
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DATED: June 3, 2024

19 
20 ELAYNA J. YOUCAH
21 UNITED STATES MAGISTRATE JUDGE
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